Aegis Environmental, Inc.
(804) 378-6015
(804) 379-2389 (fax)
www.aegisenv.com

August 17, 2015

Mr. Scott Haley
DEQ-PRO
4949-A Cox Road
Glen Allen, Virginia 23060

RE: VPA Permit No. VPA00583 Renewal Application, Bear Island Paper WB LLC

Dear Mr. Haley:

Aegis Environmental, Inc. is submitting this renewal application on behalf of Bear Island Paper WB, L.L.C. for the facility's Virginia Pollution Abatement (VPA) permit. This permit regulates the surface storage of wastewater in a 15 million gallon "Emergency Basin" that is used to temporarily store liquids intended for the on-site wastewater treatment plant. Two other lined basins with volumes of 5 million gallons and 25 million gallons are located nearby; however, these are used to hold treated water prior to discharging under the facility's VPDES permit, not wastewater. Form A and Form C are attached along with supporting diagrams. Based on conversations with you, we have not completed Forms D-V or D-VI because Bear Island Paper is not seeking a land application or bio-solids disposal permit.

The Emergency Basin was constructed of earthen materials in 1977, and was emptied and lined with a synthetic geomembrane in 1995. One upgradient groundwater monitoring well (MW-2) and two downgradient groundwater monitoring wells (MW-15, MW-25) have been tested quarterly since 1990. Since the installation of the synthetic liner, impacts to groundwater in the vicinity of this basin have declined substantially. All parameters currently monitored have declined, and all analyzed metals have returned to background levels:

- Chromium has not been detected in a downgradient well above background levels since Dec 2010,
- Cadmium has not been detected in groundwater since December 2005,
- Lead has not been detected in a downgradient well above background levels since March 2004, and
- Zinc has not been detected in a downgradient well above background levels since July 2002.

Based on these declining groundwater analytical results, Bear Island Paper requests that VDEQ consider removing metals from the groundwater monitoring program, and reducing the sampling frequency for the remaining indicator parameters to semiannual monitoring events.

Please feel free to contact me at (804) 378-6015 if you require additional information or have any questions about this application.

Sincerely,

Mason A. Pritchett

Mason A. Pritchett, P.G.
Project Geologist

VIRGINIA POLLUTION ABATEMENT PERMIT APPLICATION
FORM A
ALL APPLICANTS

1. FACILITY OR APPLICANT INFORMATION

Facility Name or Applicant Name:	Bear Island Paper WB, LLC
County/City:	Hanover County, VA
Physical Location/ Address:	10026 Old Ridge Road, Ashland, VA 23005
Mailing Address:	10026 Old Ridge Road, Ashland, VA 23005

2. OWNER INFORMATION

Owner Legal Name:	Bear Island Paper WB, LLC
Mailing Address:	10026 Old Ridge Road
Telephone Number:	804-227-4035
Email address:	swilson@bi.whitebirchpaper.com

3. OWNER CONTACT INFORMATION

Owner Contact Name:	Scott Wilson
Title:	General Manager
Mailing Address:	10026 Old Ridge Road, Ashland, VA 23005
Telephone Number:	804-227-4035
Email address:	swilson@bi.whitebirchpaper.com

4. EXISTING PERMITS: (e.g., VPA, VPDES; VWP, RCRA; UIC; other)

Agency	Permit Type	Permit Number
VDEQ	VPDES (Industrial discharge)	VA0029521
VDEQ	VPDES (Stormwater)	VA0077763
VDEQ	VPA	VPA00583
VDEQ VDEQ	Title V Industrial Landfill	VA50840 573

5. NATURE OF BUSINESS: Paper Mill

SIC Code(s):	2621		

VIRGINIA POLLUTION ABATEMENT PERMIT APPLICATION
FORM A
ALL APPLICANTS

6. TYPE OF POLLUTANT MANAGEMENT ACTIVITY: *check the appropriate box(es)*

	Proposed	Existing
Animal Feeding Operations (complete Form B)	☐	☐
Industrial Waste (complete Form C & Form D: Parts D-V & D-VI)	☐	☒
Land Application of Municipal Effluent (complete Form D: Parts D-I & D-III)	☐	☐
Land Application of Biosolids/Sewage Sludge (complete Form D: Parts D-II, D-IV, D-V & D-VI; and Liability Requirements for Transport, Storage and Land Application of Biosolids Form)	☐	☐
Reclamation and/or Distribution of Reclaimed Wastewater (Application Addendum)	☐	☐

7. GENERAL LOCATION MAP:

Provide a general location map which clearly identifies the location of the facility. **Attached Figures 2 and 3**

CONSENT TO RECEIVE AND CERTIFY RECEIPT OF ELECTRONIC MAIL:

The Department of Environmental Quality (DEQ) may deliver permits, certifications and plan approvals to recipients, including applicants or permittees, by electronically certified mail where the recipients notify DEQ of their consent to receive mail electronically (§ 10.1-1183). Check only one of the following to consent to or decline receipt of electronic mail from DEQ as follows:

☐ Applicant or permittee agrees to receive by electronic mail the permit and any plan approvals associated with the permit that may be issued for the proposed pollutant management activity, and to certify receipt of such electronic mail when requested by the DEQ.

☐ Applicant or permittee declines to receive by electronic mail the permit and any plan approvals associated with the permit that may be issued for the proposed pollutant management activity.

8. SIGNATURE AND CERTIFICATION STATEMENT:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering information, the information submitted is to the best of my knowledge and belief true, accurate and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment for knowing violations. I further certify that I am an authorized signatory as specified in the VPA Permit Regulation (9VAC25-32).

Signature:	Scott Wilson	Date:	Aug 18 2015
Printed Name:	Scott Wilson		
Title:	General Manager		

VIRGINIA POLLUTION ABATEMENT PERMIT APPLICATION

FORM C

INDUSTRIAL WASTE

PART C-I General Information

1. Facility Name: Bear Island Paper WB, LLC

2. Source(s) of Waste

a. *Provide a narrative which explains your facility operations and how wastes are produced.*

Newsprint is manufactured using thermomechanical pulping and recycled paper pulping. Wastewater and paper residues are produced from these processes and are transferred to the on-site wastewater treatment plant. After treatment, dewatered paper residues are either sold as a byproduct, burned in a boiler, or transferred to the on-site industrial landfill and water is discharged to the North Anna River under a permitted discharge with Hanover County. The facility has three HDPE-lined wastewater holding basins: 5MG, 15MG, and 25MG. The 5MG and 25MG basins are intended to store treated wastewater that may be discharged to the North Anna River, although this is rarely done. The facility's VPDES permit requires the discharge to be diverted to these basins under dry conditions until River levels increase. The 15MG basin is used as an emergency holding basin to store Mill wastewater during upset conditions at the Mill or wastewater treatment plant.

b. *Attach a line drawing of the facility in block diagram for showing the manufacturing or processing operations and all points where wastes are produced.* **Attached Figure 1**

c. *Explain how sewage from employees is handled (i.e., septic tank/drainfield,sanitary sewer etc.):*

The sewage from employees is collected and pumped to the Hanover County sewerage system. All sewage piping and pumping is segregated from process sewers.

d. Operational Parameters

Maximum hours/day of operation:	24
Average hours/day of operation:	24
Days/week of operation:	7
Specific months of operation:	January through December

3. Non-Hazardous Declaration

a. Statement for Plant Operations

Is any part of the manufacturing operations, plant processes or waste treatment facilities at these plant facilities under the purview of the "Virginia Hazardous Waste Management Regulations" or the "Virginia Solid Waste Management Regulations?" _X_ *Yes* _____*No.*

If Yes, please provide a brief explanation of the type of permit or requirements that apply.

Bear Island Paper WB, LLC is permitted by the VA DEQ Solid Waste Facility Permit #573 to serve as an industrial landfill for the exclusive use of Bear Island Paper WB, LLC. The landfill accepts only non-hazardous wastes from normal plant operations. Wastes accepted include stabilized sludges containing no free liquids, ash, papermaking fabrics, office waste, pallets, other wood products, packaging materials, metals, and discarded process equipment that can not otherwise be salvaged.

b. For waste to be land applied, a responsible person, as defined by VR680-14-01, must sign the following statement.

I certify that the waste described in this application is non-hazardous and not regulated under the Resource Conservation and Recovery Act.

_____ **Date**_____

(Signature of Owner)

4. Waste Characterization

a. Wastewater - Provide at least one analysis for each parameter. Upon review, additional analyses may be required by DEQ.

Parameter	Concentration	
Flow to treatment	4.5	MGD
Flow to storage	0.103	MGD
Vol. to treatment		MG
Vol. to storage	37.682 /year	MG
Vol. Land applied	0	MG/year
BOD_5	5.6	mg/l
COD		mg/l
TOC		mg/l
TSS	15.2	mg/l
Percent Solids		%
pH	7.1	S.U.
Alkalinity as $CaCO_3$		mg/l
Nitrogen, (Nitrate)	0.12	mg/l
Nitrogen, (Ammonium)		mg/l
Nitrogen, (Total Kjeldahl)	3.34	mg/l
Phosphorus, (Total)	0.24	mg/l
Potassium, (Total)		mg/l
Sodium		mg/l
		mg/l

b. Sludge - Provide at least one analysis for each parameter. Upon review, additional analyses may be required by DEQ.

Parameter	Concentration*	
Percent Solids		%
Volatile Solids		%
pH		S.U.
Alkalinity as $CaCO_3$**		mg/kg
Nitrogen (Nitrate)		mg/kg
Nitrogen (Ammonium)		mg/kg
Nitrogen (Total Kjeldahl)		mg/kg
Phosphorous (Total)		mg/kg
Potassium (Total)		mg/kg
Lead		mg/kg
Cadmium		mg/kg
Copper		mg/kg
Nickel		mg/kg
Zinc		mg/kg
		mg/kg

* Unless otherwise noted, report results on dry weight basis.

** Lime treated sludges (l0% or more lime by dry weight) should be analyzed for percent $CaCO_3$.

c. *Provide a separate waste characterization listing for each wastewater and sludge generated at the facility. Insert "Yes" beside all parameters believed present and provide at least one analysis for each. Insert "No" beside all parameters believed not present. Indicate "NA" for any parameter already addressed in Item 4a. or 4b.*

Parameter	Believed Present (yes or no)	Concentration
Sodium	_____	_____
Bromide	_____	_____
Total Residual Chlorine	_____	_____
Fecal Coliform	_____	_____
Fluoride	_____	_____
Oil & Grease	_____	_____
Total Radioactivity	_____	_____
Total Alpha	_____	_____
Total Beta	_____	_____
Total Radium	_____	_____
Total Radium 226	_____	_____
Sulfate (as SO_4)	_____	_____
Sulfide (as S)	_____	_____
Sulfite (as SO_3)	_____	_____
Surfactants	_____	_____
Total Aluminum	_____	_____
Total Barium	_____	_____
Total Boron	_____	_____
Total Cobalt	_____	_____
Total Iron	_____	_____
Total Magnesium	_____	_____
Total Molybdenum	_____	_____
Total Manganese	_____	_____
Total Tin	_____	_____
Total Titanium	_____	_____
Total Antimony	_____	_____
Total Arsenic	_____	_____
Total Beryllium	_____	_____
Total Cadmium	_____	_____
Total Chromium	_____	_____
Total Copper	_____	_____
Total Lead	_____	_____
Total Mercury	_____	_____
Total Nickel	_____	_____
Total Selenium	_____	_____
Total Silver	_____	_____
Total Thallium	_____	_____
Total Zinc	_____	_____
Total Cyanide	_____	_____
Total Phenols	_____	_____
Dioxin	_____	_____
Acrolein	_____	_____

*If the analysis is for sludge, report results on dry weight basis.

c. (Continued)

Parameter	Believed Present (yes or no)	Concentration
Acrylonitrile		
Benzene		
Bis(Chloromethyl)Ether		
Bromoform		
Carbon Tetrachloride		
Chlorobenzene		
Chlorodibromomethane		
Chloroethane		
2-Chloroethylvinyl Ether		
Chloroform		
Dichlorobromomethane		
Dichlorodifluoromethane		
1,1-Dichloroethane		
1,2-Dichloroethane		
1,1-Dichloroethylene		
1,2-Dichloropropane		
1,3-Dichloropropylene		
Ethylbenzene		
Methyl Bromide		
Methyl Chloride		
Methylene Chloride		
1,1,2,2-Tetrachlorethane		
Tetrachloroethylene		
Toluene		
1,2-TransDichloroethylene1		
1,1,-Trichloroethane		
1,1,2,-Trichloroethane		
Trichloroethylene		
Trichlorofluoromethane		
Vinyl Chloride		
2-Chlorophenol		
2,4-Dichlorophenol		
2,4-Dimethylphenol		
4,6-Dinitro-O-Cresol		
2,4-Dinitrophenol		
2-Nitrophenol		
4-Nitrophenol		
P-Chlor-M-Cresol		
Pentachlorophenol		
Phenol		
2,4,6-Trichlorophenol		
Acenaphthene		
Acenaphtylene		
Acenaphtylene		
Benzidine		
Benzo(a)Athracene		
Benzo(a)Pyrene		
3,4-Benzofluoranthene		
Benzo(ghi) Perylene		
Benzo(k)Fluoranthene		
Bis(2-Chloroethoxy)Methane		
Bis(2-Chloroethyl) Ether		
Bis(2-Chloroisopropyl)Ether		
Bis(2-Ethylhexyl) Phthalate		
4-Bromophenyl Phenyl Ether		
Butyl Benzyl Phthalate		
4-Chlorophenyl Phenyl Ether		
2-Chloronaphthalene		
Chrysene		
Dibenzo(a,h) Anthracene		

c. (Continued)

Parameter	Believed Present (yes or no)	Concentration
1,2-Dichlorobenzene		
1,3-Dichlorobenzene		
1,4-Dichlorobenzene		
3,3'-Dichlorobenzidine		
Diethyl Phthalate		
Dimethyl Phthalate		
Di-N-Butyl Phthalate		
2,4-Dinitrotoluene		
2,6-Dinitrotoluene		
Di-N-Octyl Phthalate		
1,2-Diphenylhydrazine(as		
Azobenzene)		
Fluoranthene		
Fluorene		
Hexachlorobenzene		
Hexachlorobutadiene		
Hexachlorocyclopentadiene		
Hexachloroethane		
Indeno(1,2,3-cd)Pyrene		
Isophorone		
Naphthalene		
Nitrobenzene		
N-Nitrosodimethylamine		
N-Nitrosodi-N-Propylamine		
N-Nitrosodiphenylamine		
Phenanthane		
Pyrene		
1,2,4 - Trichlorobenzene		
Aldrin		
á- BHC		
â- BHC		
ã- BHC		
ä- BHC		
Chlordane		
4,4'- DDT		
4,4'- DDE		
4,4'- DDD		
Dieldrin		
á-Endosulfan		
â-Endosulfan		
Endosulfan Sulfate		
Endrin		
Endrin Aldehyde		
Heptachlor		
Heptachlor Epoxide		
PCB - 1242		
PCB - 1254		
PCB - 1221		
PCB - 1232		
PCB - 1248		
PCB - 1260		
PCB - 1016		
Toxaphene		
Chloromethane		
Chlorpyrifos		
Demeton		
Dichloromethane		
(2,4-dichlorophenoxy) acetic		
acid (2,4-D)		
Di-2-Ethylhexyl Phthalate		
MBAS		

c. (Continued)

Parameter	Believed Present (yes or no)	Concentration
Lindane	_____	_____
Hydrogen Sulfide	_____	_____
Silvex	_____	_____
Tributyltin	_____	_____
Kepone	_____	_____
Malathion	_____	_____
Methoxyclor	_____	_____
Mirex	_____	_____
Monochlorobenzene	_____	_____
Parathion	_____	_____

d. Provide a separate waste characterization listing for each wastewater and sludge generated at the facility. List any additional parameters believed present in the spaces provided below and provide at least one analysis for each.

Parameter	Concentration
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

5. Briefly describe the design and provide a line drawing of the waste treatment facility which relates the various components of the treatment system including source(s), treatment unit(s), disposal alternatives, and flow estimates from the various process units.

The facility has three HDPE-lined wastewater holding basins on-site: 5 million gallon, 15 million gallon, and 25 million gallon. The 5MG basin and 25MG basin store treated wastewater that can not be discharged to the North Anna River due to extreme drought conditions. The 15MG basin is used as an emergency holding basin to store mill wastewater during upset conditions at the mill or wastewater treatment plant. See Figure 4 for a diagram of wastewater treatment processes. A groundwater monitoring program has been in effect for the basins since at least 1989.

6. Indicate the number and type of wast e storage facilities. If existing, indicate the volume; DEQ may require additional information upon review.

No.		Existing (Volume)	Proposed
___	Earthen Storage Pond	_____	_____
3	Storage Pit (HDPE lined)	5, 15, 25 MG - wastewater only, no sludge	_____
___	Storage Tank	_____	_____
___	Anaerobic Lagoon	_____	_____
___	Other _____	_____	_____
	_____	_____	_____

7. Have the existing storage/treatment facilities identified in Item 5 and 6 above been previously approved by the Department of Environmental Quality?
Yes X No_____

If yes, provide the date of the approval and proceed to Item 8.
Approval Date: 2/16/06 (Current VPA Permit)

If no, provide information required by Items 9, 10, and ll.

8. Have the previously approved facilities been altered or expanded?
Yes_____ No X

If yes, it will be necessary to provide the information for such facilities, as required by Items 9 & 10, and 11.

If no, proceed to Item 12.

9. Provide conceptual design for the treatment facilities including design approach used. Explain how ground water will be protected. Demonstration should include soil evaluat ion, geology, hydrology, and topography. The following information must be provided for each proposed facility identified in Item 6 above and for those existing facilities in Items 7 and 8 which have not been either previously approved or were altered:

   a. *Design calculations for volume (ft^3) and estimated days of storage*

   b. *Description of lining material and permeability*

   c. *Plan and cross-sectional views*

   d. *Depth to seasonal high water table and separation to permanent water table.*

10. Will the proposed waste storage/treatment facilities be located within the 100 -year flood plain? _____Yes _____No.

    If yes, what is the elevation of the l00-year flood plain and elevation of the proposed facilities. Also, how will the waste storage facilities be protected from flooding? (Flood elevation can be obtained from your local county zoning/planning department).

    _____
    _____
    _____
    _____
    _____
    _____
    _____
    _____

11. Will the proposed or existing storage/treatment facilities receive any storm water runoff? _____Yes _____No.

    If yes, provide total area (square feet, acres, etc.) from which runoff will occur and indicate this area on the line drawing (Item 5).

    Total area: _____
    Dimensions: _____

12. Will any part of the waste genera ted at your facility be land applied? Yes _____ No __X__. If yes, Part C-II must be completed.

VIRGINIA POLLUTION ABATEMENT PERMIT APPLICATION

FORM C

INDUSTRIAL WASTE

PART C-II Land Application and Waste Handling Procedure

Facility Name: _____

Items 1-12 pertain to the land application of industrial sludge/wastewater at frequent and infrequent rates. The applicant may request a waiver in writing for any of the required information if it is not pertinent to their operation.

1. For each land application site provide a topographic map of sufficient scale (5 foot contour preferred) clearly showing the location of the following features within 0.25 mile of the site. Provide a legend with approximate scale. (See General Instructions for map requirements.)

a. Proposed or existing ground water monitoring wells
b. General direction of ground water movement
c. Water wells, abandoned or operating
d. Surface water
e. Springs
f. Public water supply(s)
g. Sink holes
h. Underground and/or surface mines
i. Mine pool (or others) surface water discharge points
j. Mining spoil piles and mine dumps
k. Quarry(s)
l. Sand and gravel pits
m. Gas and oil wells
n. Diversion ditch(s)
o. Agricultural drainage ditch(s)
p. Occupied dwellings, including industrial and commercial establishments
q. Landfills or dumps
r. Other unlined impoundments
s. Septic tanks and drainfields
t. Injection wells
u. Rock outcrops
v. Soil boring or test pits locations
w. Subsurface drainage tile

2. For each land application site provide a site plan of sufficient detail to clearly show any landscape features which will require buffer zones or may limit land application. Provide a legend and clearly mark the field boundaries and property lines. The following landscape features should be delineated. (See General Instructions for map requirements.)

   a. Drainageways
   b. Rock outcrops
   c. Sink holes
   d. Drinking water wells and springs
   e. Monitoring wells
   f. Property lines
   g. Roadways
   h. Occupied dwellings
   i. Slopes (greater than 8% by slope class)
   j. Wet spots
   k. Severe erosion (SCS designation)
   l. Frequently flooded soils (SCS designation)
   m. Surface waters

3. Provide a complete description of agronomic practices for each crop to be grown, on field-by-field basis including a nutrient management program, soil and/or plant tissue testing, and the coordination of tillage practices, planting and harvesting schedules and timing of land application.

4. Describe all land application methods and any equipment used in the process.

5. Provide a detailed soil survey map, preferably photographically based, with the field boundari es clearly marked. (A USDA-SCS soil survey map should be provided, if available.)

   Provide a detailed legend for each soil survey map which uses accepted USDA-SCS descriptions of the typifying pedon for each soil series (soil type). Complex associations may be described as a range of characteristics. Soil descriptions should include the following information.

   a. Soil symbol
   b. Soil series, textural phase and slope class
   c. Depth to seasonal high water table
   d. Depth to bedrock
   e. Estimated productivity group (for the proposed crop rotation).
   f. Estimated infiltration rate (surface soil)
   g. Estimated permeability of most restrictive subsoil layer

6. Representative soil borings for frequent land application and fixed spray irrigation s, (to no less than 5 ft. or to the water table) are to be conducted for the typifying pedon of each soil series (soil type) and the following data collected and tests performed. All results for infiltration and permeability tests should be enclosed. Provide information on the items below:

   a. Soil symbol
   b. Soil series, textural phase and slope class
   c. Depth to seasonal high water table
   d. Depth to bedrock
   e. Estimated productivity group (for the proposed crop rotation).
   f. Estimated infiltration rate (surface soil)
   g. Estimated permeability of most restrictive subsoil layer

7. Representative soil samples are to be collected for each major soil type and analyzed for the soil parameters indicated on Page C-II.6. Samples are to be taken at a depth of 0-6 in.

8. Land Area Determination:

   a. Land area requirements are to be calculated and justified for each of the parameters listed below:

Parameters	*Method of Determining Required Area*
1. Nitrogen	*Crop uptake, immobilization denitrification, leaching*
2. Phosphorus	*Crop uptake, soil adsorption*
3. Potassium	*Crop uptake*
4. Sulfur	*Crop uptake, soil adsorption leaching*
5. Salts	*Sodium Adsorption Ratio (SAR), leaching*
6. Carbon/Nitrogen Ratio	
7. Metals(Ni, Cu, Zn, Pb, Co, Cd or other)	*Cumulative loading for site life*
8. Anions (As, B, Chlorides)	*Leaching, Soil Adsorption*
9. Calcium Carbonate Equivalency	*Soil pH management*
10. Other Parameters (As needed or as requested by DEQ)	

   For each parameter and method of assimilation, (i.e. crop uptake, denitrification, immobilization, soil adsorption leaching, etc.), the required land area is to be justified by attach ing calculations and appropriate references. Allowances for soil adsorption are to be justified by pertinent soil testing.

   Provide calculations describing the nutrient value of the waste as lbs per dry ton or mg/l nitrogen (PAN), phosphorus (P_2O_5), potassium (K_2O), and any liming effects which may occur from land application.

b. *Land area requirements for application of industrial wastewater or liquid sludge are to be determined and an annual water balance on a monthly basis developed integrating the following factors:*

1. *Monthly precipitation*
2. *Monthly evapotranspiration data*
3. *Soil percolation rates (from subsurface permeability data)*
4. *Monthly wastewater loading*
5. *Monthly storage requirement*
6. *Monthly storage input/drawdown*

9. Does the volume of wastewater generated as determined by the water balance in 8.b. exceed the hydraulic loading rate (inches/acre/year) of the soils? _____Yes _____No

If Yes, explain how excess loading will be disposed of:

_____
_____
_____
_____
_____
_____
_____
_____

10. Is the land application site owned by the applicant? _____Yes_____No.

If No, answer question 11 and have the land owner complete the authorization form, Page C-II-5.

11. Complete page C -II.5 by providing the name(s), address(es), site locations and signatures of non-applicant land owner on whose pr operty industrial waste will be applied (A separate approval will be required for each additional owner.):

AUTHORIZATION TO LAND APPLY WASTE

(Land Owner must sign and date this approval)

As land owner, I authorize _____ _____to land apply wastewater/sludge to my property in accordance with their VPA Form C application. This authorization will remain in effect until such time as I notify the Department of Environmental Quality in writing that th is authorization has been withdrawn.

Name: _____

Address: _____

_____

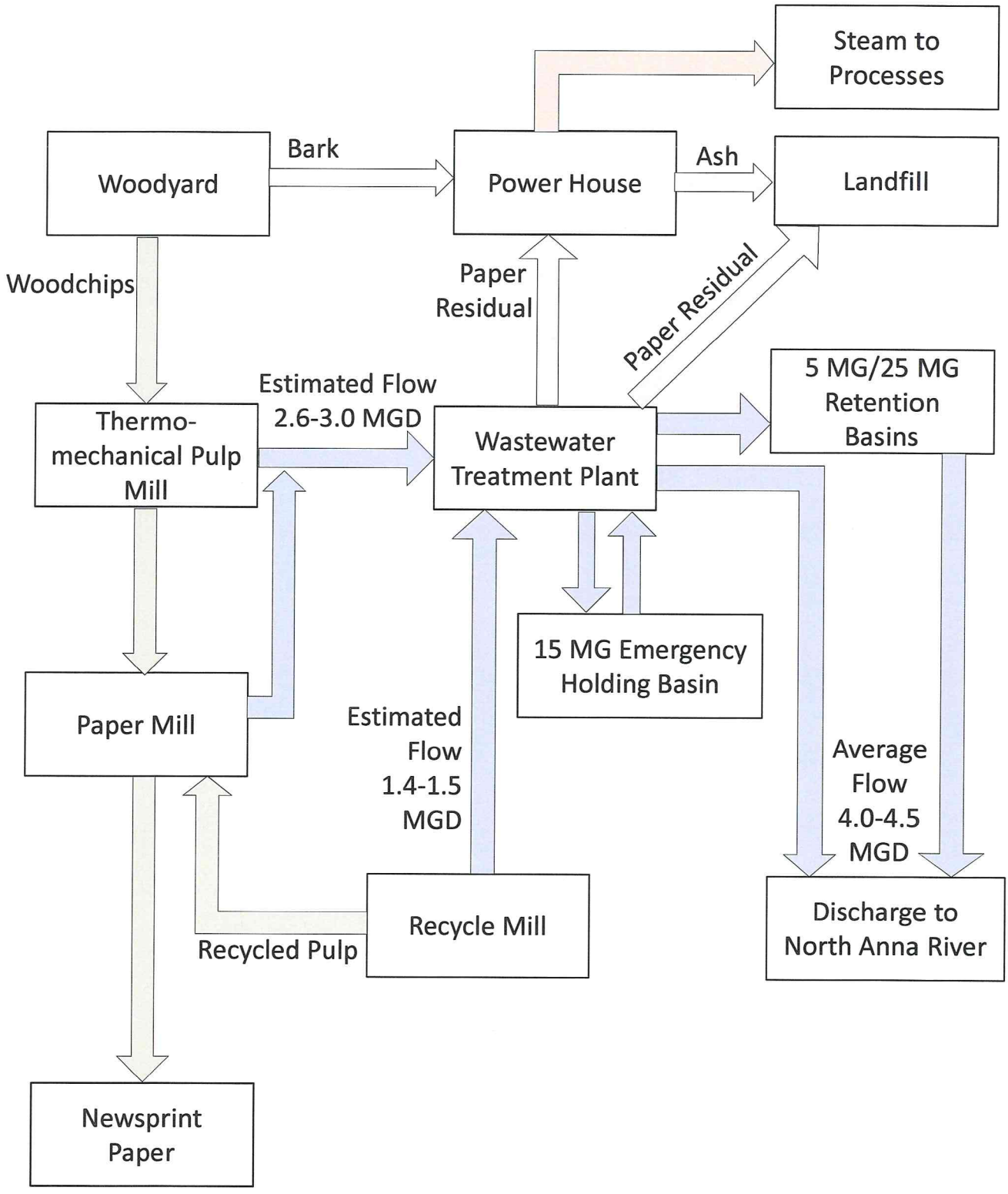
Telephone: _____

Site Location(s) _____

Date: _____

Signature: _____

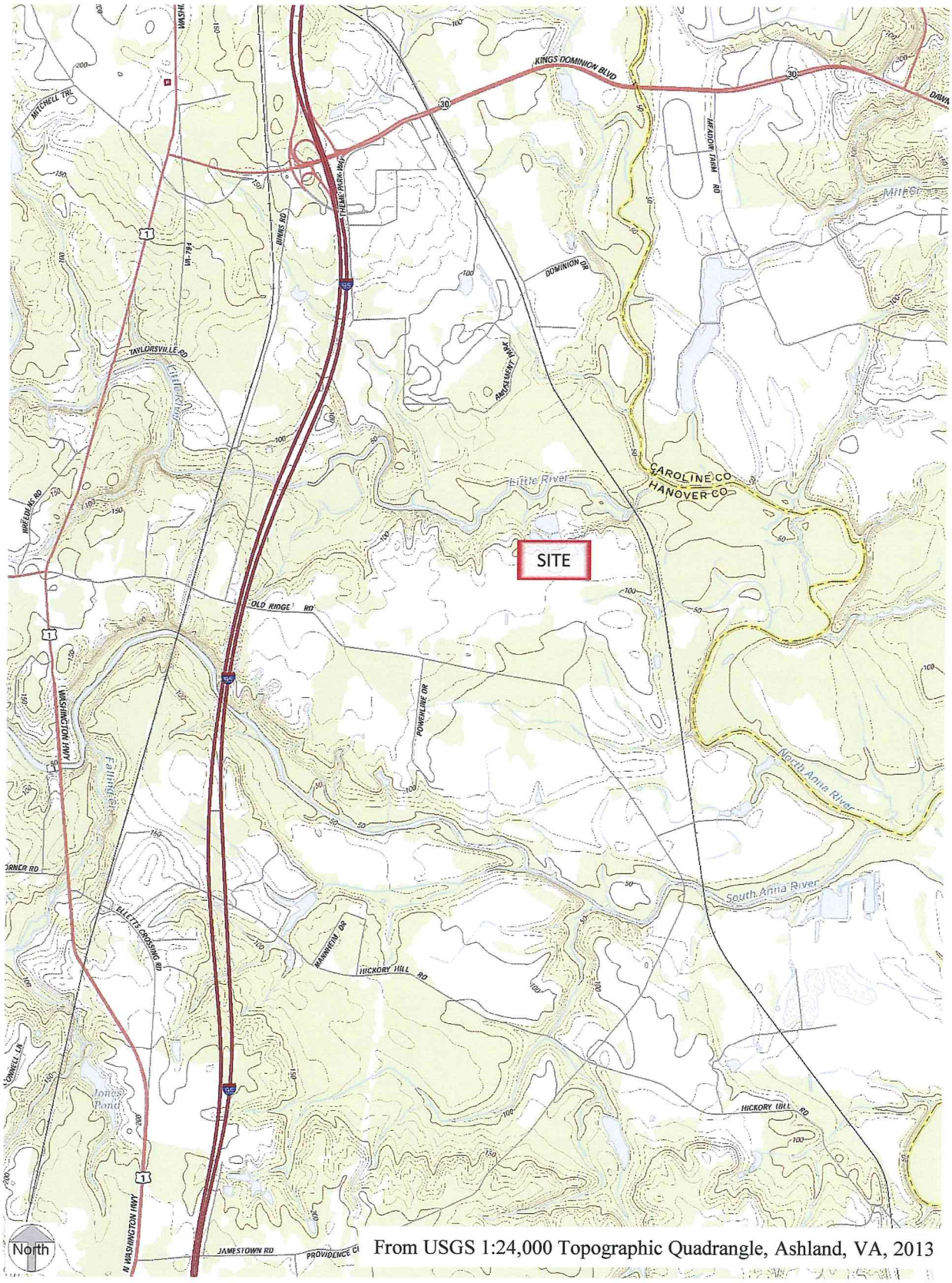
Rev. 10-1995



Process Flow Diagram
Bear Island Paper WB, LLC
10026 Old Ridge Road
Ashland, VA 23005

BIP-002

FIGURE 1



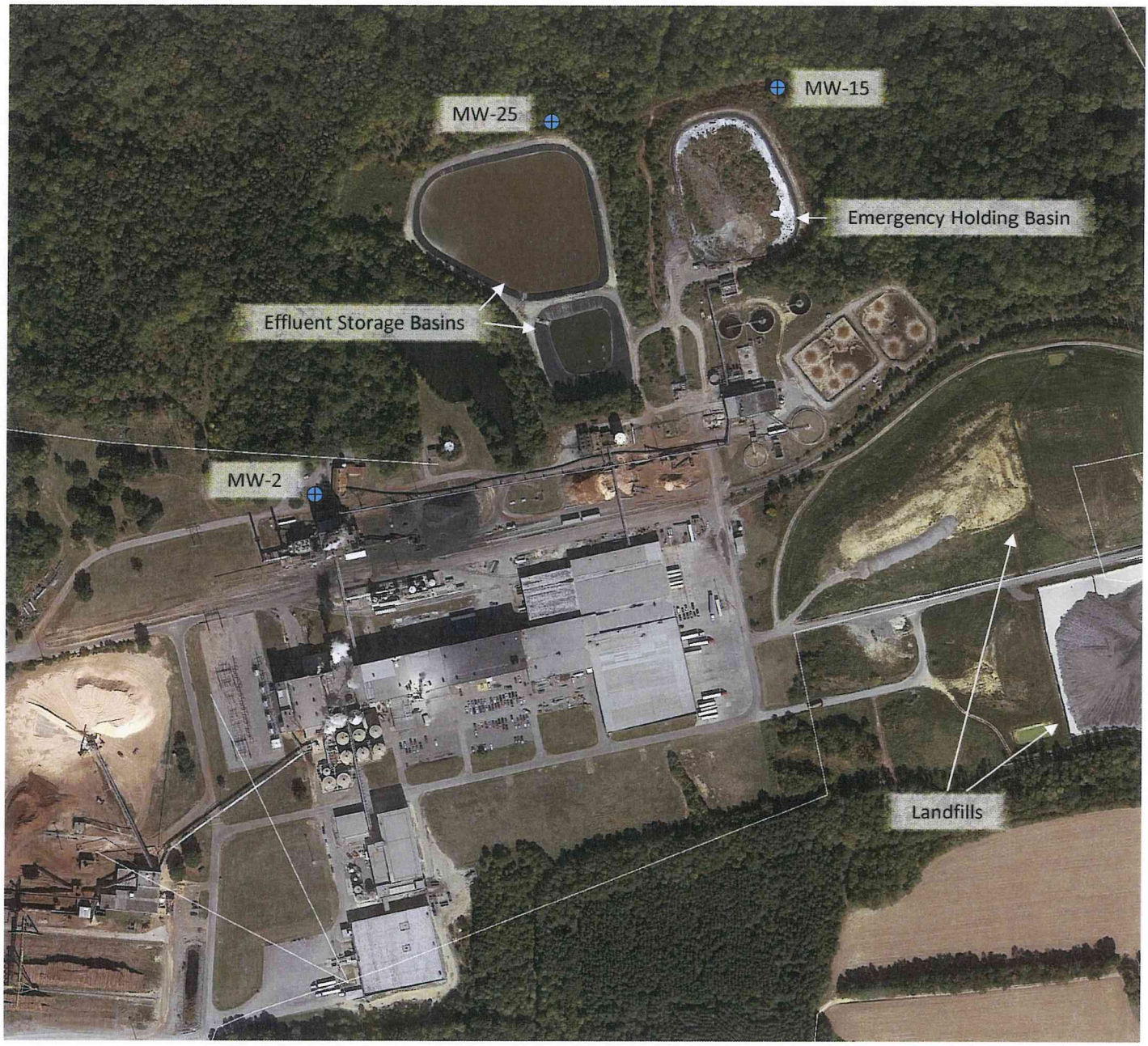
From USGS 1:24,000 Topographic Quadrangle, Ashland, VA, 2013

aegis ENVIRONMENTAL

Location and Topographic Map
Bear Island Paper WB, LLC
10026 Old Ridge Road
Ashland, VA 23005

BIP-002

FIGURE 2



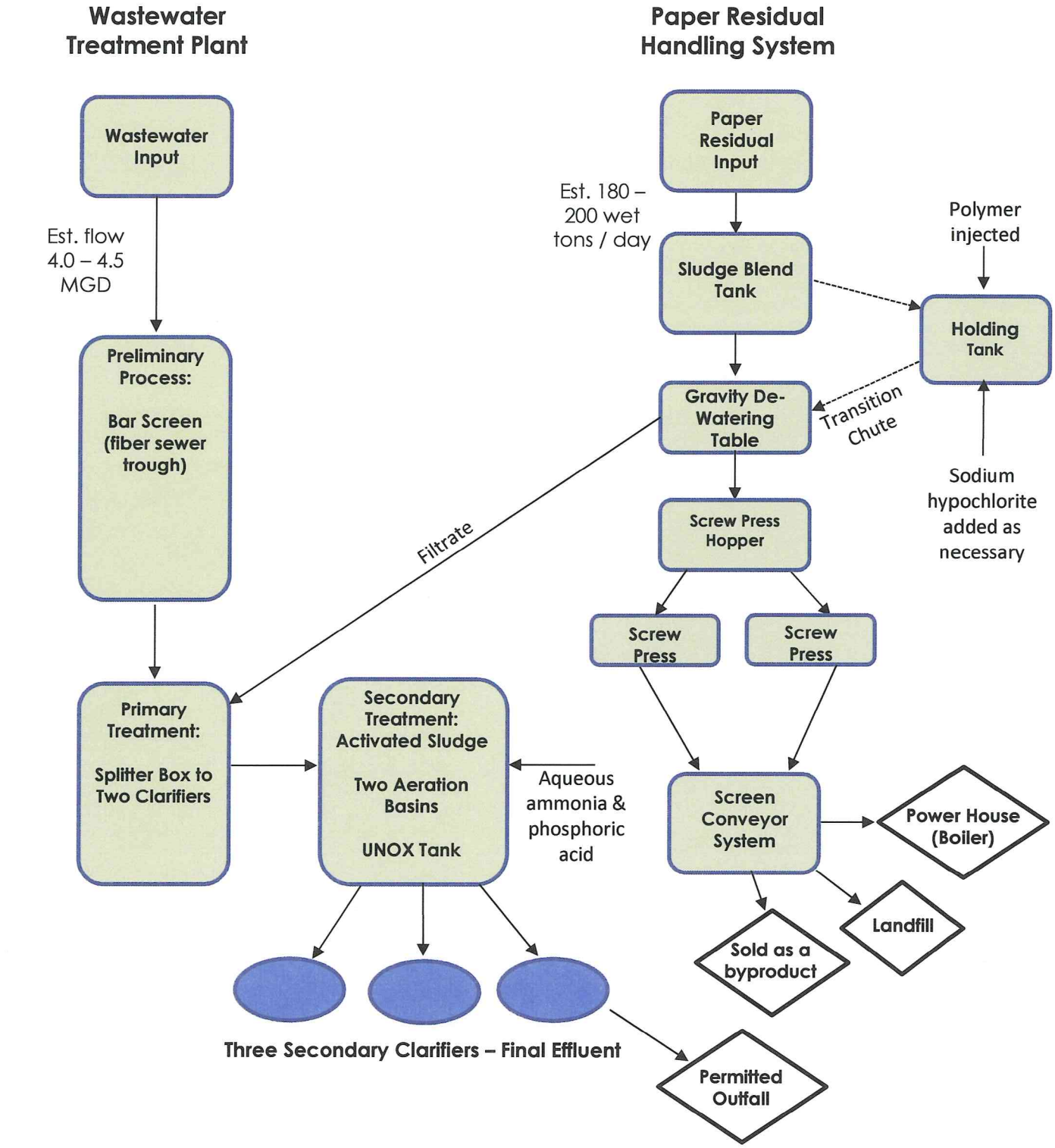
North

aegis ENVIRONMENTAL

VPA Site Plan
Bear Island Paper WB, LLC
10026 Old Ridge Road
Ashland, VA 23005

BIP-002

FIGURE 3



Waste Treatment Flow Diagram
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BIP-002

FIGURE 4